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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

PETER DELVECCHIA, individually and as
next friend of A.D., a Minor,

Plaintiffs,

v.

FRONTIER AIRLINES, INC.,
SCOTT WARREN, and REX SHUPE,

Defendants.

Case No.: 2:19-cv-01322-KJD-DJA

**FRONTIER’S RESPONSE TO
PLAINTIFFS’ MOTION FOR LEAVE
TO FILE EXHIBIT A UNDER SEAL**

**DEFENDANT FRONTIER AIRLINES, INC.’s
RESPONSE TO PLAINTIFFS’ MOTION FOR LEAVE TO FILE
EXHIBIT A TO MOTION FOR SANCTIONS UNDER SEAL**

Defendant Frontier Airlines, Inc., (“Frontier”), by its undersigned counsel, submits this Response to Plaintiffs’ Motion for Leave to File Exhibit A Under Seal (ECF #130).

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On August 20, 2021, Plaintiffs filed a Motion for Sanctions Against Frontier Airlines, Inc. (ECF #128). Concurrently, Plaintiffs filed a Motion for Leave to File Exhibit A to the Motion for Sanctions Under Seal (ECF #130), pursuant to Local Rule IA 10-5. Exhibit A contains documents previously produced by Frontier during discovery and which were designated as Confidential by Frontier pursuant to the Parties' Agreed Protective Order (ECF #37).

Frontier will be filing its Opposition to Plaintiffs' Motion for Sanctions; however, Frontier has no objection to Plaintiffs' request to file Exhibit A to their Motion under seal. Given Plaintiffs' challenge to Frontier's designation of these documents as confidential, Frontier will move separately for an order establishing the applicability of the Confidential designation to these particular documents, in accordance with the Agreed Protective Order (ECF #37).

DATED this 3rd day of September, 2021

Respectfully submitted,

/s/ Brian T. Maye

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CERTIFICATE OF SERVICE

I hereby certify that on September 3, 2021, I caused the foregoing to be electronically filed with the United States District Court for the District of Nevada using the CM/ECF system.

By: /s/ Brian T. Maye